

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

LEHMAN BROTHERS HOLDINGS INC., *et al.*,  
Debtors.

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: Chapter 11  
:  
: Case No. 08-13555 (JMP)  
:  
: (Jointly Administered)  
:  
:

**DECLARATION OF DEAN A. ZIEHL IN SUPPORT OF MOTION FOR ORDER  
COMPELLING ARBITRATION OF DISPUTES UNDER SETTLEMENT AGREEMENT  
BETWEEN DEBTORS AND ARCH INSURANCE COMPANY**

Pursuant to 28 U.S.C. § 1746, Dean A. Ziehl declares:

1. I am a partner of the firm of Pachulski Stang Ziehl & Jones LLP ("PSZJ"), 780 Third Ave., 34<sup>th</sup> Floor, New York, New York 10017, and am admitted to practice law in the States of California and New York, as well as the District of Columbia. I am also admitted to practice before various district and circuit courts, including the Southern District of New York and the Second Circuit Court of Appeals.

2. I am authorized to submit this Declaration in support of the *Motion for Order Compelling Arbitration of Disputes Under Settlement Agreement Between Debtors and Arch Insurance Company* (the "Motion").<sup>1</sup> All facts set forth in this Declaration are based upon my personal knowledge. If I were called upon to testify, I could and would testify competently to the facts set forth herein.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the letter from Lehman to the JAMS arbitrator, the Hon. Daniel Weinstein (Ret.), dated August 20, 2015.

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the  
United States of America that the foregoing is true and correct.

Dated: October 26, 2015  
Los Angeles, California

/s/ Dean A. Ziehl  
Dean A. Ziehl